# Exhibit 55

# Quarterly Compliance Report to Board of Directors 1Q2014

Bert Weinstein
Vice President, Corporate Compliance
May 15, 2014



# **Compliance Summary for 1Q2014**

Purdue continues to have excellent systems and processes in place to prevent and detect violations, and to remediate issues before they become major.

No significant compliance issues to date in 2014

Company-Wide Compliance Scorecard YTD score is 3.14 out of 3.5

in-line with previous year's scores (2011= 3.09;
2012= 3.12; 2013 = 3.15)



### **Government Action Continues**

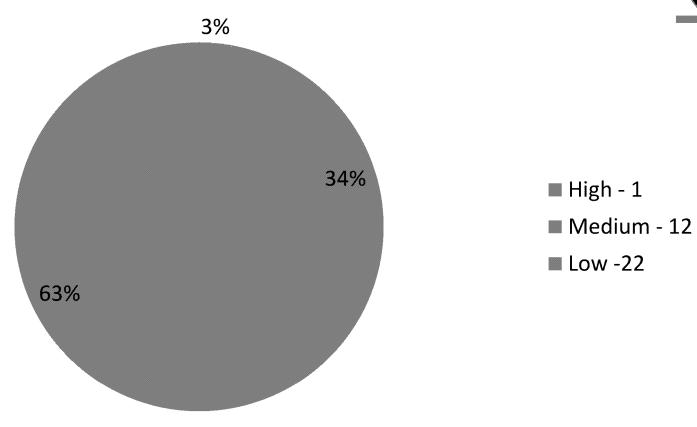


- Government pharma fraud and abuse prosecutions continue apace, with aggressive plaintiffs bar "supplementing" limited government resources - - \$8 billion recovered in 2013 by Federal and state governments
- 2014 Significant Federal Activity
  - Astellas off-label pediatric promotion of anti-fungal 4/2014
  - Teva kick-backs paid to induce Rx's of anti-psychotic 3/2014
  - Endo off-label promotion of Lidoderm 2/2014
  - Novartis Federal suit for payments to specialty pharmacy 1/2014



# **Top Compliance Risks 1Q14**







# Top Compliance Risks, and Mitigation



### We prioritize compliance activities based on relative risks Managed Care (High Risk)

- Increased government scrutiny, affecting large number of lives, significant generic pressure on formulary listing; Managed Care seeking aggressive rebate levels and implementing Prior Authorizations for most opioids
- Mitigation includes auditing and monitoring by Corporate Compliance, training, guidelines and procedures

### Government Price Reporting (Medium Risk)

- Continued focus by CMS and OIG on accurate price reporting, with highly complex regulations
- Mitigation includes oversight by Law and EAC, third party audits, policies and procedures



# Top Compliance Risks, and Mitigation



### Sunshine Act (Medium Risk)

- Receiving clean data from CROs, and numerous data inaccuracies in meals provided to HCPs (both home office and sales force) are still problematic
- Mitigation includes increased training and business manager accountability

### <u>Appropriate Promotion (Medium Risk)</u>

- Includes Sales Representative, Third-Party Activities, Speaker Programs, and Social Media, with risk around inappropriate promotion around abuse potential, comparisons to other products, convenience / superiority claims
- Mitigation includes auditing and monitoring by Corporate Compliance, training, guidelines, and procedures



# Compliance Audits Completed - 2014



### Medical Information Requests (Low Risk)

- To provide a level of assurance that inquires received by Medical Services were not solicited and/or confirm whether or not improper promotion may have occurred by Sales Representatives
- No Critical Findings; positive practice noted around detection of potential solicitation of inquiries

### Call Note Follow-Up Audit (Medium Risk)

- Follow-up to 2010 Compliance audit, to verify that District Managers were properly reviewing, coaching, and documenting any issues discovered in call notes
- No Critical Findings; 2 Major Findings (unclear call notes, missed AEs); improvements shown from previous audit



# Compliance Audits Completed - 2014



### Material Review (Medium Risk)

- To assess expired status of materials in the APRIMO system
- Report pending No Critical Findings; 1 Major Finding (~5% of materials were expired but still in use); several positive practices were noted

### Field Contact Report Audits (Medium Risk)

- One random audit and one for-cause audit (7 DMs)
- To assess whether District Managers were accurately documenting compliance issues on Field Contact Reports and appropriately evaluating Sales Representative compliance
- Report pending No Critical Findings; 3 Major Findings (timeliness of expense reporting, poor call notes, accuracy of FCR documentation)



## **Sunshine Act Update**



- Phase I registration timely, with filings on behalf of six entities:
  - Purdue Pharma L.P.
  - Purdue Neuroscience Company
  - Purdue Pharma of Puerto Rico
  - Purdue Pharma Products L.P.
  - Purdue Transdermal Technologies L.P.
  - Rhodes Pharmaceuticals
- Phase II filing anticipated to begin late May-late June (tbd)
  - 16,559 unique HCPs and Teaching Hospitals to be reported
- Data publication anticipated September 30, 2014 (?)





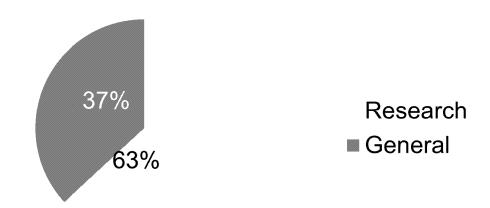
# **Sunshine Act Update**



Total Reported in Phase I: \$10,223,108.93

Open Payments Report	Total Aggregated Spend \$	Total # of Records	Total # of Covered Recipients
Research Payments	\$6,451,951.85	2,943	315
General Payments	\$3,771,157.08	25,329	16,244

### Type of Spend\*





\* As of May 5, 2014; subject to change.

# Top 15 Physicians\*



Last Name	First Name	State	Recipient Type	Spend Amount
Apseloff	Glen	ОН	MD	\$1,502,280.28
Reiner	David	NJ	MD	\$623,494.00
Pellechi	Thomas	CT	MD	\$147,345.95
Buchanan	William	TX	MD	\$126,000.00
Chipman Ii	Howard	FL	MD	\$112,578.02
Hale	Martin	FL	MD	\$83,967.43
Dawson	Gary	GA	MD	\$65,957.29
Buynak	Robert	IN	MD	\$64,200.49
Cucchiaro	Giovanni	CA	MD	\$62,102.92
Pergolizzi Jr	Joseph	FL	MD	\$57,247.61
Surowitz	Ronald	FL	MD	\$56,942.54
Taber	Louise	AZ	MD	\$48,812.01
Ratzman	David	IN	MD	\$39,176.13
Schertzinger	Howard	ОН	MD	\$37,507.76
Simon	Steven	KS	MD	\$36,452.03



<sup>\*</sup> As of May 5, 2014; subject to change.